

1 THE HONORABLE JOHN C. COUGHENOUR  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JAMES HEALY, on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

MILLIMAN, INC., d/b/a INTELLISCRIPt,

Defendant.

Case No. 2:20-cv-01473-JCC

**STIPULATED MOTION AND [PROPOSED]  
ORDER TO EXTEND EXPERT DEADLINES**

**NOTED FOR CONSIDERATION:  
JANUARY 07, 2022**

16 Plaintiff James Healy and Defendant Milliman, Inc. jointly move this Court for entry of an  
17 order granting a short extension of deadlines for expert discovery, but without any change to  
18 the briefing schedule for Plaintiff's motion for class certification, and in support state as follows:

19 1. This is a proposed class action case that was filed on October 5, 2020. Plaintiff  
20 alleges among other things that Defendant failed to ensure that the consumer reports it  
21 prepares and disseminates—which contain sensitive prescription or medical history bearing on  
22 the ability to obtain life insurance—include accurate information, in violation of the FCRA.  
23 Defendant has denied these allegations.

24 2. On December 10, 2021, Milliman produced data from its IRIX system for one  
25 million randomly selected reports as the Court ordered. See Dkt. No. 66.

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1       3. Plaintiff's counsel asked Milliman to produce IRIX data for Plaintiff so that  
 2 Plaintiff's expert could compare Plaintiff's data to the sample data, which Milliman agreed to  
 3 produce.

4       4. Milliman produced the requested data on January 5, 2022, two days before  
 5 Plaintiff's expert report is due. Accordingly, Plaintiff's counsel requested a one week extension  
 6 of the deadline to submit Plaintiff's expert report.

7       5. The parties have agreed to extend the deadline for Plaintiff's expert report one  
 8 week to January 14, 2022 so that Plaintiff's expert can work with the additional data. The  
 9 parties also have agreed to extend the deadline for Milliman's expert report one week to  
 10 February 11, 2022.

11       6. The proposed deadlines will not impact any other deadline in the case, including  
 12 the deadline for Plaintiff's rebuttal expert report and the class certification briefing schedule.

13       7. For these reasons, the parties jointly request an amended class certification  
 14 expert discovery schedule as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Plaintiff's class expert disclosures and reports due	1/7/2022	1/14/2022
Defendants' class expert disclosures and reports due	2/4/2022	2/11/2022
Plaintiff's class rebuttal expert disclosures and reports due	3/4/2022	3/4/2022

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1 STIPULATED TO AND DATED this 8th day of January, 2022.

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12 *Attorneys for Defendant*

## **II. ~~PROPOSED~~ ORDER**

Pursuant to the parties Stipulated Motion to Extend Deadlines, IT IS SO ORDERED. The discovery deadlines are extended as follows:

Event	Current Deadline	Proposed Deadline
Plaintiff's class expert disclosures and reports due	1/7/2022	1/14/2022
Defendants' class expert disclosures and reports due	2/4/2022	2/11/2022
Plaintiff's class rebuttal expert disclosures and reports due	3/4/2022	3/4/2022

IT IS SO ORDERED.

DATED this 10th day of January 2022.

Joh C Coyle

John C. Coughenour  
UNITED STATES DISTRICT JUDGE